

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO.: 05-CV-11806-RWZ

JODY REILLY,

Plaintiff,

v.

THOMAS ROBBINS, as Colonel of the
Massachusetts State Police
Defendants

JOINT CONFERENCE STATEMENT PURSUANT TO LR 16.1

I. Joint Discovery Plan

- A. Service of Automatic Required Disclosures Pursuant to Rule 26(a)(1): September 15, 2006
- B. Amendment to pleadings: October 15, 2006
- C. Written Discovery served & answered by: February 15, 2007

Interrogatories: 30 each
Request for production of documents: no change from LR 26.1
Requests to admit: no change from LR 26.1
- D. Non-expert depositions completed by: May 15, 2007

Depositions: max. 12 each (not including experts or keeper of records)
- E. Plaintiff's trial experts disclosed by: June 15, 2007
- F. Defendant's trial experts disclosed by: July 15, 2007
- G. Depositions of plaintiff's experts completed by: August 15, 2007
- H. Depositions of defendant's experts completed by: September 15, 2007

- I. Dispositive motions filed by: September 30, 2007
- J. Final pre-trial conference held by: January 15, 2007
- K. Trial: Post – January 17, 2007

II. Proposed Schedule for Filing of Motions

- A. See Section I. I.

III. Use of Magistrate Judges

The parties have conferred and do not consent to have this case referred to a magistrate judge.

IV. Certifications of Counsel and Authorized Representative of Each Party

To be submitted by the parties at or before the August 15, 2006 Scheduling Conference.

Respectfully submitted,

JODY REILLY,
by her attorney,

THOMAS ROBBINS as Colonel of the
Massachusetts State Police
By its attorneys,

THOMAS F. REILLY
ATTORNEY GENERAL

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CERTIFICATE OF SERVICE

I hereby certify that on this date, August 10, 2006 I served a copy of this document, filed through the ECF system, electronically to the registered participant identified on the Notice of Electronic Filing to the following electronic address: swlang@lxblaw.com. There are no non-registered participants in this action.

/s/ Maite A. Parsi
Maite A. Parsi